

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GARY KOOPMANN, TIMOTHY KIDD and
VICTOR PIRNIK, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff(s),

V.

FIAT CHRYSLER AUTOMOBILES N.V.,
SERGIO MARCHIONNE, RICHARD K.
PALMER, SCOTT KUNSELMAN, MICHAEL
DAHL, STEVE MAZURE and ROBERT E. LEE
Defendants.

: Civ. Action No: 15-cv-
07199-JMF

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**DECLARATION OF JONATHAN STERN IN SUPPORT OF PLAINTIFFS'
MOTION TO FOR CONFERENCE**

I, Jonathan Stern, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney at the Rosen Law Firm, P.A., appointed by the Court as Co-Class Counsel for the Class Representatives Gary Koopmann, Timothy Kidd, and Victor Pirnik, in the above captioned action.
 2. I submit this declaration in conjunction with Plaintiffs' Letter Motion to for an informal conference.
 3. Attached hereto as Exhibit 1 is a true and correct copy of the Amended Expert Rebuttal Report of Daniel C. Esty, dated October 2, 2018.
 4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the

Deposition Transcript of Robert E. Lee, dated June 29, 2018.

5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the Deposition Transcript of Emanuele Palma, dated June 22, 2018.
6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the Deposition Transcript of Steven Mazure, dated July 10, 2018.
7. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the Deposition Transcript of Beth Borland, dated July 10, 2018.
8. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the Deposition Transcript of Donald Altermatt, dated August 1, 2018.
9. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the Transcript of the Examination of Sergio Marchionne, dated May 16, 2018.
10. Attached hereto as Exhibit 8 is a true and correct of copy of FCA-PIRNIK-001629010-FCA-PIRNIK-001629011, a document produced by Defendants in this action.
11. Attached hereto as Exhibit 9 is a true and correct of copy of FCA-PIRNIK-001641720-FCA-PIRNIK-001641731, a document produced by Defendants in this action.
12. Attached hereto as Exhibit 10 is a true and correct of copy of FCA-PIRNIK-001632116, a document produced by Defendants in this action.
13. Attached hereto as Exhibit 11 is a true and correct copy of FCA-PIRNIK-001262369-FCA-PIRNIK-001262372, a document produced by Defendants in this action.
14. Attached hereto as Exhibit 12 is a true and correct copy of FCA-PIRNIK-001646046-FCA-PIRNIK-001646048, a document produced by Defendants in this action.

15. Attached hereto as Exhibit 13 is a true and correct copy of FCA-PIRNIK-001660201-FCA-PIRNIK-001660208, a document produced by Defendants in this action.
16. Attached hereto as Exhibit 14 is a true and correct copy of FCA-PIRNIK-001631945-FCA-PIRNIK-001631947, a document produced by Defendants in this action.
17. Attached hereto as Exhibit 15 is a true and correct copy of excerpts from the Deposition Transcript of Michael Dahl, dated July 17, 2018.
18. Attached hereto as Exhibit 16 is a true and correct copy of FCA-PIRNIK-001648412-FCA-PIRNIK-001648414, a document produced by Defendants in this action.
19. Attached hereto as Exhibit 17 is a true and correct copy of Defendants' privilege log.
20. Attached hereto as Exhibit 18 is a true and correct copy of the Affidavit of Roger G. Ortega, dated July 6, 2018 (filed under seal).
21. Attached hereto as Exhibit 19 is a true and correct copy of FCA-PIRNIK-001530757-FCA-PIRNIK-001530761, a document produced by Defendants in this action.
22. Attached hereto as Exhibit 20 is a true and correct copy of FCA-PIRNIK-001353745-FCA-PIRNIK-001353749, a document produced by Defendants in this action.
23. Attached hereto as Exhibit 21 is a true and correct copy of FCA-PIRNIK-001622311-FCA-PIRNIK-001622313, a document produced by Defendants in this action.
24. Attached hereto as Exhibit 22 is a true and correct copy of FCA-PIRNIK-002074287, a document produced by Defendants in this action.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 13th day of December 2018, in New York, NY

/s/ Jonathan Stern
Jonathan Stern